

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA : Hon. C.L. Waldor
v. : Crim. No. 20-9057
TIMUR DAVIS : 18 U.S.C. § 1012 and § 2

INFORMATION

The United States Attorney for the District of New Jersey charges:

1. At all times relevant to this Information:
 - A. Defendant Timur Davis (“defendant DAVIS”) was the Executive Director of the Orange Public Library (the “Library”).
 - B. The Library was a public library serving Orange residents.
 - C. The United States Department of Housing and Urban Development (“HUD”) was a department of the Executive Branch of the United States Government. HUD’s mission was to create strong, sustainable, inclusive communities and quality affordable homes for low- and moderate income residents. HUD sponsored a Community Development Block Grant (“CDBG”) program to disburse grants for local communities to address a range of housing and development issues.
 - D. The County of Essex was a county in Northeast New Jersey with a local government that administered all county business (the “County”),

including the receipt and disbursement of CDBG funds that the County received from HUD.

E. In or about June 2014, Orange and the Library agreed with the County to receive \$50,000 in CDBG funds to conduct a Saturday Literacy Program to offer tutoring services for low- and moderate income families at the Library (the "Saturday Literacy Program").

F. In or about September 2014, Orange and the Library agreed with the County to receive \$48,000 in CDBG funds to replace the HVAC/Chiller unit at the Library (the "Chiller Replacement Project").

2. Between in or about March 2015 and in or about December 2015, defendant DAVIS intentionally employed the fraudulent means set forth below, including causing the making of false reports to and for HUD, to induce the County to provide the Library with CDBG funds earmarked for these projects:

A. Defendant DAVIS signed a voucher, falsely certifying that the services referenced in the voucher had been rendered in connection with the Saturday Literacy Program, when defendant DAVIS knew that was not so. Thereafter, defendant DAVIS and others caused the Library to pay out approximately \$28,000 of these funds for services that had not, in fact, been rendered.

B. Defendant DAVIS signed vouchers, falsely certifying that the services referenced in the vouchers had been rendered in connection with the Chiller Replacement Project, when defendant DAVIS knew that was not so. In support of one of the vouchers, defendant DAVIS created and caused to be submitted to the County a fraudulent invoice purportedly from the Company under contract with the Library to replace the Chiller (the "Company"). Defendant DAVIS and others caused the Library to pay out

approximately \$40,000 to the Company to replace the Chiller, which, in fact, was not done as of December 22, 2015, when Orange and the Library notified the County that the CDBG funds for the Chiller Replacement Project would be returned to the County.

3. Between in or about March 2015 and in or about December 2015, in Essex County, in the District of New Jersey and elsewhere, defendant

TIMUR DAVIS,

knowingly and with intent to defraud, did make, and cause to be made, false reports and statements to and for HUD in connection with the Saturday Literacy Program and the Chiller Replacement Project.

In violation of Title 18, United States Code, Section 1012 and Section 2.

Craig Carpenito
CRAIG CARPENITO
UNITED STATES ATTORNEY

CASE NUMBER: _____

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v.

TIMUR DAVIS

INFORMATION FOR

**18 U.S.C. §§ 1012
and 2**

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